

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JOSHUA BRENNER, Individually and)
on behalf of all others similarly situated,)
)
Plaintiffs,)
)
v.) Case No.: 4:21-cv-1127
)
WATCH GANG, INC.)
)
&)
)
MATTHEW GALLAGHER)
)
&)
)
ATTENTIVE MOBILE, INC.)
)
)
Defendant.)

NOTICE OF SETTLEMENT AS TO DEFENDANTS
WATCH GANG, INC. & MATTHEW GALLAGHER

COMES NOW, Plaintiff Joshua Brenner, by and through the undersigned counsel, and gives notice to the court that a settlement has been reached between the Plaintiff and Defendants Watch Gang, Inc. and Matthew Gallagher in this matter.

1. Plaintiff and Defendants Watch Gang, Inc. and Matthew Gallagher have settled all matters in controversy in principle and are in the process of finalizing their settlement of this matter.
2. The parties expect to file a notice of dismissal with prejudice within the next 60 days as part of that settlement.
3. The parties request a stay of 60 days to allow the parties time in which to finalize the settlement agreement, procure all necessary signatures, and allow the parties adequate time to fulfill the terms of the settlement agreement in their entirety.

WHEREFORE the Plaintiff respectfully requests that the Court vacate all outstanding case deadlines and court dates as to Defendants Watch Gang, Inc. and Matthew Gallagher, and allow the parties 60 days in which to file a notice of dismissal as to Defendants Watch Gang, Inc. and Matthew Gallagher, along with any other relief the Court deems just and proper.

Dated: November 4, 2021

Respectfully Submitted,

HALVORSEN KLOTE

By: /s/ Samantha J. Orlowski
Samantha J. Orlowski, #72058
Joel S. Halvorsen, #67032
680 Craig Road, Suite 104
St. Louis, MO 63141
P: (314) 451-1314
F: (314) 787-4323
sam@hklawstl.com
joel@hklawstl.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned signature below is certification that a true and correct copy of this document was sent via court's electronic filing system this 4th day of November 2021, to the following counsel of record:

MANATT AND PHELPS LLP - Chicago
Madelaine Newcomb, Esq.
151 N. Franklin St.
Suite 2600
Chicago, IL 60606
P: 312-477-4766
E: mnewcomb@manatt.com
Attorney of Attentive Mobile, Inc.

/s/ Samantha J. Orlowski